

**United States District Court
Northern District of Texas
Dallas Division**

**Bertrum Jean et al.,
Plaintiffs,**

v.

**The City of Dallas, Texas and
Amber Guyger,
Defendants.**

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Civil Action No. 3:18-cv-02862-M

Defendant Amber Guyger's Motion for Withdrawal of Counsel

Defendant Amber Guyger ("Guyger") files this motion for withdrawal of counsel, and shows the following:

1. The costs of Guyger's defense in this action have, until now, been paid by the City of Dallas ("City") under the City of Dallas Officer and Employee Liability Plan ("Plan"), found in chapter 31A of the Dallas City Code. In connection with providing that defense, the City retained Mark E. Goldstucker to represent Guyger in this action and agreed to pay his reasonable fees and expenses.

2. On October 1, 2019, a jury in Dallas County, Texas, found Guyger guilty of the intentional and knowing violation of a penal statute of the State of Texas, arising out of the same events on which this action is based. A claim against an officer or employee based on conduct resulting in such a conviction is excluded from coverage under the Plan.

3. The City has now notified Guyger that, because of Guyger's criminal conviction, the City will no longer pay the costs of Guyger's defense, including the fees and expenses of her attorney, in this action.

4. Guyger requests that her current be permitted to withdraw as counsel of record for Guyger.

5. Guyger is unable to pay the fees for her current counsel of record, Mark E. Goldstucker, to continue representing her in this action and therefore requests that the attorney be allowed to withdraw from representing her. Guyger understands that such withdrawal will leave her without attorney representation in this action and that, unless she retains another attorney at a future date, she will be representing herself.

6. Prior to withdrawal, her current attorney will ensure that any actions with deadlines in the next 30 days are completed and that Guyger is aware of all other case matters.

7. This withdrawal is not sought for delay only. By her signature below, Guyger approves the requested withdrawal.

Wherefore, Defendant Amber Guyger requests that this motion be granted and that the Court order the Clerk of the Court to remove Mark E. Goldstucker as counsel of record for Guyger.

Respectfully submitted,

s/ Mark E. Goldstucker

Mark E. Goldstucker

State Bar of Texas No. 08104100

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Richardson, Texas 75080

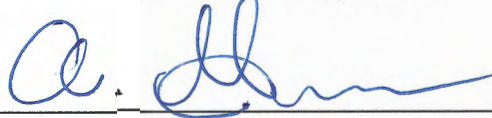
Telephone: 972-479-1112

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Attorney for Defendant Amber Guyger

Withdrawal of counsel approved:



Amber Guyger

Date: 1-13-20

Certificate of Conference

On the _____ day of _____, 2020, the undersigned attorney for Guyger conferred by email with Plaintiffs' attorney, Daryl K. Washington, regarding this motion. Mr. Washington stated that [Plaintiffs are not opposed / Plaintiffs are opposed.]

s/ Mark E. Goldstucker

Mark E. Goldstucker

Certificate of Service

On the _____ day of _____, 2020, a copy of the foregoing document was served electronically through the Court's ECF system on all counsel of record, and by United States mail to Defendant Amber Guyger.

s/ Mark E. Goldstucker

Mark E. Goldstucker